

## **REMARKS**

Applicants and the undersigned thank Examiner Bomar for his careful review of this application. Reconsideration of the present application in light of the above-amendments to the claims and in view of the following remarks is respectfully requested.

In the present communication, claims 1 and 11 have been amended and claims. Claims 2-10 and 12-20 have been maintained in their original or previously presented form. Thus, claims 1-20 are pending in the present application.

## **REJECTIONS UNDER 35 U.S.C. § 103**

Applicant respectfully traverses the rejection of claims 1-20 as allegedly being obvious under 35 U.S.C. §103(a) over Lohbeck, et al. in view of Dellinger, et al. Neither Lohbeck nor Dellinger teaches all of the elements of independent claims 1 and 11, as amended. Specifically, Lohbeck and Dellinger fail to teach, suggest, or make obvious coupling the tubular liner to the second wellbore casing by radially expanding and plastically deforming the tubular liner against the second wellbore casing, as set forth in amended claim 1. Furthermore, Lohbeck and Dellinger fail to teach, suggest, or make obvious a system having a means for coupling the tubular liner to the second wellbore casing by radially expanding and plastically deforming the tubular liner against the second wellbore casing, as set forth in amended claim 11.

The Examiner admits that Lohbeck fails to teach or suggest positioning a tubular liner within the borehole and coupled to the wellbore casing. See *Office Action*, p. 2. Dellinger teaches lowering a casing liner into the casing. The casing liner “has an outside diameter less than the inside diameter of the casing 13” *Dellinger*, col. 4:20-21. The liner is “spaced from casing 13 and supported by the casing hanger 32 positioned at the top of the first vertical portion of the wellbore above the kick-off point 7.” *Dellinger*, col. 4:25-27. “The annulus between casing 13 and liner 31 is sealed at the lower ends of the casing and the liner by a mechanism such as packer bore receptacle.” *Dellinger*, col. 4:31-33. “After the liner is set in place, the drill string 21 and drill bit 19 are re-run into the wellbore.” *Dellinger*, col. 4, 36-37.

Thus, Dellinger does not teach coupling the liner to the second casing, but instead, teaches coupling the liner to a casing hanger and a packer bore receptacle. In addition, Dellinger does not teach radially expanding and plastically deforming the liner to couple it to the second casing. Instead, as shown above, the liner is just placed inside the casing and coupled to the casing hanger and packer bore receptacle. No radial expansion or plastic deformation of the liner is taught or suggested. Accordingly, reconsideration and withdrawal of the pending rejection of claims 1 and 11 is respectfully requested.

#### **DEPENDENT CLAIMS 2-10 AND 12-20**

The Applicants respectfully submit that the above-identified dependent claims are allowable because the independent claims from which they depend, Claims 1 and 11 are patentable over the cited references. The Applicants also respectfully traverse the Examiner's assertions about these claims and submit that the recitations of these dependent claims are of patentable significance. The Applicants respectfully request that the Examiner reconsider and withdraw the pending rejection of Claims 2-10 and 12-20.

#### **CONCLUSION**

The foregoing is submitted as a full and complete response to the Office Action mailed on July 26, 2007. Applicants have made a diligent effort to advance the prosecution of the application by submitting claim amendments and arguments in support of the patentability of claims 1-20. Applicants have not acquiesced to any rejection and reserve the right to address the patentability of any additional claim features in the future.

As the three-month statutory period for reply expires on October 26, 2007, this response is therefore considered timely filed and no fees are believed to be due. However, should the Commissioner deem any fees as being due, including any fees for any extensions of time, the Commissioner is hereby authorized to debit said fees from, or to credit any overpayments to, USPTO Deposit Account Number 50-3786, Reference No. 14147.105111.

The Examiner is invited to contact the undersigned via telephone at the number listed below if a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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